

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff LG.Philips LCD Co., Ltd. ("LPL,") moves the Court, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, for a Preliminary Injunction enjoining, restraining, and prohibiting Defendants Tatung Co., Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd., and ViewSonic Corporation (collectively the "Defendants"), and each of their respective parents, subsidiaries, affiliates, successors, predecessors, and assigns, and the officers, directors, agents, servants and employees of each of the Defendants and of each of the foregoing, and those persons acting in concert or participation with any of them, from making, using, selling, offering for sale or importing any liquid crystal display ("LCD") or other flat panel display products, including but not limited to LCD computer monitors and LCD televisions, that infringe, or from engaging in any conduct or activity that induces or contributes to the infringement of, U.S. Patent No. 6,738,121 ("the '121 Patent").

As set forth more fully in the accompanying memorandum in support of this Motion, preliminary injunctive relief is both necessary and appropriate because:

1. There is a substantial likelihood that LPL will succeed on the merits of its patent infringement claims;

2. Unless the Court grants LPL the preliminary relief sought herein, LPL will suffer irreparable injury as a result of the Defendants' conduct;

3. The balance of harms strongly favors LPL because the continued harm to LPL without an injunction far outweighs any claimed harm to Defendants should an injunction issue; and

4. The issuance of a preliminary injunction will serve the public interest.

Accordingly, LPL respectfully requests that this Court enter the proposed Order Entering Preliminary Injunction submitted with this Motion.

November 1, 2005

THE BAYARD FIRM

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[PROPOSED] ORDER ENTERING PRELIMINARY INJUNCTION

Upon consideration of Plaintiff LG.Philips LCD Co., Ltd.'s ("LPL") Motion for Preliminary Injunction, the memorandum and declarations and exhibits in support thereof, Defendants' oppositions thereto, and after a hearing, it is

ORDERED, ADJUDGED, AND DECREED that the Defendants Tatung Co., Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd., and ViewSonic Corporation (collectively the "Defendants"), and each of their respective parents, subsidiaries, affiliates, successors, predecessors, and assigns, and the officers, directors, agents, servants and employees of each of the Defendants and of each of the foregoing, and those persons acting in concert or participation with any of them, are hereby enjoined, restrained and prohibited from directly or indirectly making, using, selling, offering for sale or importing any LCD or other flat panel display products, including but not limited to LCD computer monitors and LCD televisions that infringe, or from engaging in any conduct or activity that induces or contributes to the infringement of, U.S. Patent No. 6,738,121 ("the '121 Patent"), including but not limited to

making, using, selling, offering for sale or importing those devices or products sold under the model name or designations Tatung LI7AMTN monitors and ViewSonic VE710S monitors.

This _____ day of _____, 2005

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on November 1, 2005, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent by hand to the above counsel and by email and first class mail to the following non-registered participants:

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